

Edward J. Maney, Trustee, Bar #12256
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Phoenix, Arizona 85003
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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF ARIZONA

In re:) In Proceedings Under Chapter 13
MICHAEL PATRICK FLAHERTY)
) Case No. 2:16-07828-BKM
)
)
) TRUSTEE'S MOTION TO DISMISS

Debtor (s))

COMES NOW Edward J. Maney, Trustee in the above-captioned Chapter 13 Proceeding and states that the debtor(s) is/are in default under the terms of their Chapter 13 Plan. Plan payments are 3+ months delinquent and no showing has been made of any just cause for the default.

Total delinquency as of this date: \$2,200.00
The next scheduled payment is due: September 7, 2018

The Trustee will lodge an order dismissing this case if the debtor(s) fail to meet one of the following requirements:

1. All Plan payments must be current by September 17, 2018. **Including any payment that come due within the guidelines of this Motion to Dismiss**
2. The debtor(s) file a Notice of Conversion to a Chapter 7 with the Court and serve a copy on the Trustee.
3. The debtor(s) file a Motion for a Moratorium of Plan Payments with the Court and serve a copy on the Trustee.

Dated: [see electronic signature]

Edward J. Maney, Esq.
Digitally signed by Edward J. Maney, Esq.
Date: 2018.08.14 09:47:44 -07'00'

CERTIFICATE OF MAILING FOR CASE NO. 16-07828
Copies of the foregoing mailed (see electronic signature below) to the following:

Kenneth L. Neeley, Esq.
2250 E. Germann Road
Suite #11
Chandler, AZ 85286-
Attorney for Debtor

MICHAEL PATRICK FLAHERTY
5601 W. MONTEREY STREET
CHANDLER, AZ 85226
Debtor

5601 W. MONTEREY STREET
CHANDLER, AZ 85226
Co-Debtor

Jackie Garcia
Digitally signed by Jackie Garcia
DN: cn=Jackie Garcia, o=Edward J. Maney, Trustee, ou=File Clerk, email=jgarcia@maney13trustee.com, c=US
Date: 2018.08.15 08:40:13 -07'00'
Trustee's Clerk